

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ROBERT BERG,

Plaintiff

- against -

M&F WESTERN PRODUCTS, INC.,

Defendant

Case No. 6:19-cv-418-JDK

PLAINTIFF’S PRETRIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a) (3) and the Court’s Scheduling Order, Plaintiff Robert Berg (“Berg”), discloses the following trial witness, deposition testimony and exhibits.

I. TRIAL WITNESSES

- a. Robert Berg, Plaintiff
- b. Monique Compton, c/o Liebowitz Law Firm, PLLC, 11 Sunrise Plaza, Suite 305, Valley Stream, New York 11580
- c. Mickey Eddins,
- d. Gary Bellinger
- e. Cary Kraft
- f. Wayne Baize
- g. Steve Dees
- h. David Eddins
- i. Mickey Eddins

- j. Paul Eddins
- k. Chad Gist
- l. Jeannie Crumrine LaShelle
- m. Gregg La Shelle
- n. Clint Mortensen
- o. Clint Orms
- p. Curtis Spain
- q. Joanne Symons
- r. Randy Rush
- s. Judy Wagner
- t. Hugh Weaver
- u. Plaintiff further reserves the right to adduce testimony of any witnesses called by Defendant in this matter.

II. DESIGNATED DEPOSITION TESTIMONY

Plaintiff reserves the right to make deposition designations at a later time. The Parties have not yet proceeded with depositions in light of discovery issues still pending with the Court, as described in Plaintiff's Motion to Compel (Dkt. 48)

III. TRIAL EXHIBITS

All documents produced by Plaintiff and all documents produced by Defendant. Plaintiff reserves the right to disclose further documents as needed to the extent Defendant produces additional documents and to respond or rebut evidence adduced by Defendant.

Dated: October 13, 2020

LIEBOWITZ LAW FIRM, PLLC

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